

EXHIBIT F

VOL. IV PG. 694

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MASSACHUSETTS

3

4 TERRI PECHNER-JAMES
and SONIA FERNANDEZ,
5 Plaintiffs

6

VOLUME IV
VS. C.A. NO. 03-12499-MLW

7

CITY OF REVERE; THOMAS
8 AMBROSINO, MAYOR; CITY OF
REVERE POLICE DEPARTMENT,
9 TERRENCE REARDON, CHIEF;
BERNARD FOSTER, SALVATORE
10 SANTORO, ROY COLANNINO,
FREDERICK ROLAND, THOMAS DOHERTY,
11 JOHN NELSON, JAMES RUSSO,
MICHAEL MURPHY, and STEVEN FORD,
Defendants

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15 CONTINUED DEPOSITION of SONIA FERNANDEZ

16 taken at the request of the defendants

17 pursuant to Rule 30 of the Federal Rules of

18 Civil Procedure before Nancy A. Diemdowicz,

19 Registered Merit Reporter, a notary public in

20 and for the Commonwealth of Massachusetts, on

21 May 16, 2006, commencing at 1:30 P.M. at the

22 City Hall, 281 Broadway, Revere,

23 Massachusetts.

24

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VOL. IV PG. 695

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1 CONTINUED EXAMINATION BY MR. PORR:

2 Q. Good afternoon, Ms. Fernandez.

3 A. Good afternoon, Mr. Porr.

4 Q. All right. We're picking up with
5 your deposition and a couple questions before
6 we get going.

7 A. Okay.

8 Q. Taking any medication today?

9 A. No, nothing.

10 Q. Okay. How are you feeling today?

11 A. My foot's sore.

12 Q. Okay. Other than that?

13 A. I'm okay.

14 Q. Hear aids, how are they?

15 A. I don't have them on. I can hear
16 you good.

17 Q. Okay. This is kind of a big boxy
18 room, so if you have trouble hearing me, speak
19 up. Okay?

20 A. Okay.

21 Q. All right? Have you reviewed any
22 documents between your last deposition session
23 and today?

24 A. No.

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1 A. I think she called me.

2 Q. And what did she say?

3 A. That she was sick to her stomach.

4 Q. Did she say why?

5 A. The questions that you asked her.

6 Q. Did she get specific about the
7 questions I asked?

8 A. My phone's ringing. I'm sorry.

9 Q. That's okay.

10 (The record was read by the
11 reporter as requested.)

12 A. She said she felt sick. She wanted
13 to throw up.

14 Q. Okay. But my question is, Did she
15 get specific about the questions I asked her?

16 A. Not really. She just said one
17 particular question made her very ill to her
18 stomach.

19 Q. And what question was that, did she
20 tell you?

21 A. She said you asked her if she had
22 an abortion.

23 Q. Oh. You haven't looked at the
24 transcript of that deposition session, have

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1 think I was dating -- I was dating James. I

2 think she was dating Mark at the time.

3 Q. Okay. And did you and she ever

4 talk about her relationship with Officer

5 James?

6 A. No.

7 Q. Did you ever talk to her about your

8 relationship with Sergeant Picardi?

9 A. In detail, you mean, like what we

10 do or --

11 Q. Talk. I mean just ever talk about

12 it.

13 A. No.

14 Q. Hey, you know -- is it Jim Picardi?

15 A. I call him James or Jimmy.

16 Q. So like, you know, "James and I

17 went out to dinner last night at a fancy

18 restaurant in Boston"?

19 A. No. Just, "How are you? How are

20 you and Jimmy doing?" Stuff like that. "Hi,

21 how are you? How are you and Mark doing?"

22 Q. Okay. And how often would you have

23 that kind of a conversation with Officer James

24 about either her relationship with officer --

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1 A. Okay.

2 Q. You said they were yelling at her.

3 Was it more than one person?

4 A. I think there was more than one

5 supervisor there.

6 Q. Do you know who the other

7 supervisor was?

8 A. Can't remember.

9 Q. Okay. Any other incident that you
10 recall where somebody yelled at Terri Pechner?

11 A. Can I skip that? If I remember,

12 I'll tell you.

13 Q. That's fine. Kathy Fish. You

14 mentioned Kathy Fish being yelled at.

15 A. Kathy was yelled at. And I don't

16 remember who yelled at her, but I know she

17 went to the garage and she was crying her eyes

18 out.

19 Q. Okay.

20 A. Sorry.

21 MR. PORR: That's okay. We'll take

22 a break.

23 (Recess taken from 2:31 P. M. to

24 2:32 P. M.)

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1 Q. I think we just had a hat trick.

2 Are you familiar with hockey at all?

3 A. Yes.

4 Q. When one player scores three goals,
5 they call it a hat trick?

6 A. They call it a hat trick?

7 Q. A hat trick.

8 A. What does that mean?

9 Q. I have no idea where the term came
10 from.

11 MR. DILDAY: People used to throw
12 their hats onto the ice when the person scored
13 three goals.

14 Q. So in the course of the deposition
15 Georgie called?

16 A. Mm-hmm.

17 Q. Son?

18 A. Mm-hmm.

19 Q. And then Crystal called, daughter
20 called?

21 A. Yes.

22 Q. And AJ, your other son, called?

23 A. Yes.

24 Q. A hat trick. Okay. So we were

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1 A. Hey, you've got my doctor's notes.

2 MR. PORR: Yeah. Madam reporter,
3 can you mark that next in order?

4

5 (Deposition Exhibit No. 14 marked.)

6 THE WITNESS: Can I run to the
7 ladies' room real quick?

8 MR. PORR: Sure. We can take a
9 break.

10 (Recess taken from 2:35 P. M. to
11 2:43 P. M.)

12 A. I can't read doctor's note,
13 Dr. Porr, but I'll try.

14 Q. That's okay. We've marked as
15 Exhibit 14 two pages from your medical records
16 from the East Boston Neighborhood Health
17 Center, and both pages are dated June 24 of
18 '97, which is the date alluded to in
19 paragraph 85 of the complaint.

20 A. Okay.

21 Q. Do you recall going to the East
22 Boston Neighborhood Health Center on that
23 date?

24 A. I guess so.

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1 A. I thought she was a therapist.

2 Same thing?

3 Q. I think it's the same thing.

4 A. Okay.

5 Q. She worked at the East Boston
6 health clinic?

7 A. She did.

8 Q. And you began seeing her for
9 therapy sessions?

10 A. I did.

11 Q. And let me ask you to take a look
12 at what's been marked as Exhibit 15.

13 A. Can I try and read it?

14 Q. Sure. She's not too bad, actually.

15 (Off-the-record discussion between
16 Mr. Dilday and the witness.)

17 Q. You've had a chance to review what
18 we've had marked as Exhibit 15?

19 MR. DILDAY: Somewhat.

20 A. Somewhat. I can't really read it.

21 Q. Some of it is written in
22 abbreviations, but I think we can work through
23 them. Looking at the first line --

24 A. Okay.

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1 Q. Okay. So you don't have a specific
2 recollection of what exactly you told her?

3 A. No.

4 Q. All right. And then she has
5 "breakup," the line with the C under it is
6 "with"?

7 A. Mm-hmm.

8 Q. "Boyfriend with history of verbal
9 abuse." Do you recall telling her about
10 verbal abuse?

11 A. No.

12 Q. Was Sergeant Picardi verbally
13 abusive to you?

14 A. No.

15 Q. Did you have a boyfriend prior to
16 Sergeant Picardi that was verbally abusive to
17 you?

18 A. No.

19 Q. "A close friend died suddenly
20 yesterday."

21 A. I don't know who that is.

22 (Off-the-record between Mr. Dilday
23 and the witness.)

24 THE WITNESS: I'm trying to think

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1 A. I don't know what she's talking
2 about there.

3 Q. Okay. All right. Did you sense
4 some sort of mixed messages from Picardi? Are
5 you okay?

6 A. Yeah. It's just one of those women
7 things. I didn't want to say that.

8 MR. DILDAY: Oh. "She states she
9 feels both good about being firm and also
10 confused."

11 Q. Ah. "And angered by ex's mixed
12 message." Does that sound consistent with
13 what you talked to her about?

14 A. Possibly.

15 Q. Okay. Do we need to take a break?

16 A. Yeah. Just for a minute.

17 MR. PORR: That's fine.

18 (Recess taken from 4:04 P. M. to
19 4:09 P. M.)

20 Q. Let me ask you to look down to the
21 next major section where it talks about
22 assessment.

23 A. Okay.

24 Q. All right. And I read it as

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1 A. Not that I know of.

2 Q. Okay. And, again, looking at
3 Exhibit 6, I see no reference to this incident
4 from August 26, '97 there.

5 Do you recall it being discussed at
6 the meeting?

7 A. Walking routes?

8 Q. Yes.

9 A. I don't know.

10 Q. Okay. Do you want to take a second
11 to look?

12 A. Yes.

13 Q. Okay.

14 A. (Looks at document.) I don't see
15 it.

16 Q. Okay.

17 MR. PORR: Let's talk for a second.

18 It's five to five. Maybe we can go off the
19 record for this.

20 (Off-the-record discussion.)

21 (The deposition then adjourned.)

22

23

24